

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

ALLSTATE INSURANCE COMPANY and, ALLSTATE LIFE INSURANCE COMPANY,	§ § § § § § § § § § §	Case No. 1:17 CV 5826
Plaintiffs,		
v.		Hon. Steven C. Seeger
AMERIPRISE FINANCIAL SERVICES, LLP,		
Defendant.		

**MOTION FOR LEAVE TO SUBSTITUTE COUNSEL AND  
TO WITHDRAW AS COUNSEL FOR PLAINTIFFS**

Now come Kristine R. Argentine and Robyn Marsh of the law firm Seyfarth Shaw LLP, (collectively, “Counsel”), as counsel of record for Plaintiffs Allstate Insurance Company and Allstate Life Insurance Company, (collectively, “Plaintiffs”), and move this Court for leave to substitute new counsel, and for Counsel to withdraw their appearance as counsel, for Plaintiffs in the above-captioned action and any subsequent proceedings related thereto. In support thereof, Counsel state as follows:

1. Counsel has represented Plaintiffs in the above-captioned action since commencement of this action.
2. Plaintiffs recently retained attorneys J. Scott Humphrey and Kate Watson Moss of the law firm Benesch Friedlander Coplan and Aronoff, LLP, to represent Plaintiffs in all matters relating to the above-captioned action.
3. Pursuant to Local Rule 83.17 of the United States District Court for the Northern District of Illinois, an attorney of record in a proceeding in which the appearance was filed may not withdraw without first obtaining leave of Court.

4. Pursuant to Local Rule 83.17, Counsel hereby seeks leave to: (a) substitute attorneys J. Scott Humphrey and Kate Watson Moss and the law firm Benesch Friedlander Coplan and Aronoff as counsel of record for Plaintiffs in the above-captioned action; and (2) permit the withdrawal of Kristine R. Argentine, Robyn Marsh and the law firm Seyfarth Shaw, LLP as counsel for Plaintiffs in this action.

5. Counsel have advised Plaintiffs of their intention to file the subject motion and have served this motion on Plaintiffs.

6. The Court, Plaintiffs, and Defendant will not suffer any prejudice as a result of Counsel's withdrawal as counsel of record in this action. Therefore, Counsel have demonstrated good cause for their withdrawal at this time, and the Court should grant Counsel's request for leave to withdraw as counsel of record for Plaintiffs, and to substitute new counsel for Plaintiffs.

7. Counsel further request that the Court and Plaintiff serve all future pleadings, notices, correspondence and other documents directly upon Plaintiffs' new counsel:

J. Scott Humphrey  
Kate Watson Moss  
Benesch Friedlander Coplan and Aronoff, LLP  
71 South Wacker Drive – Suite 1600  
Chicago, Illinois 60606

**WHEREFORE**, Kristine R. Argentine, Robyn Marsh and the law firm Seyfarth Shaw LLP, respectfully request that the Court enter an order granting them leave to withdraw as counsel of record for Plaintiffs Allstate Insurance Company and Allstate Life Insurance Company, to substitute new counsel for Plaintiffs as set forth herein, and for such other relief as is just and equitable.

**Date: November 4, 2021**

Respectfully submitted,

ALLSTATE INSURANCE COMPANY and  
ALLSTATE LIFE INSURANCE COMPANY

By: /s/ Kristine R. Argentine  
One of their attorneys

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**CERTIFICATE OF SERVICE**

I, Kristine R. Argentine, an attorney, do hereby certify that on November 4, 2021, I caused a true and correct copy of the foregoing to be served upon all counsel of record via the Court's ECF system.

/s/ Kristine R. Argentine

Kristine R. Argentine